

JERRY Y. FONG, ESQ. (SBN 99673)
THE LAW OFFICE OF JERRY FONG
885 N. SAN ANTONIO ROAD, SUITE D
LOS ALTOS, CA 94022
650/322-6123
650/322-6779 fax
jf@jerryfong.com

Attorney for Defendant SYLVESTER MOORE

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 11-00905 SBA
Plaintiff,)	
vs.)	STIPULATED REQUEST
)	TO CONTINUE THE STATUS
SYLVESTER MOORE,)	CONFERENCE CURRENTLY
Defendant.)	SCHEDULED ON JUNE 16, 2016
)	AND PROPOSED ORDER.

Plaintiff United States of America and Defendant Sylvester Moore, through their respective counsel, hereby stipulate and jointly request that the Court continue the Status Conference as to Defendant Sylvester Moore, currently scheduled on June 16, 2016, at 9:30 a.m., to August 25, 2016. The parties are still engaged in an on-going process of plea negotiations and continued researched into sentencing implications to attempt to resolve this case, including obtaining a pre-plea investigation of Mr. Moore's criminal history.

Accordingly, the parties jointly request that the Court make a finding, pursuant to 18 USC §3161 (h)(7)(B)(iv), to exclude the time from June 16, 2016, to (and including) August 25, 2016, in computing the time for the application of the Speedy Trial Act, in order to maintain the continuity of counsel for the defense and to provide defense counsel with reasonable time to adequately prepare Mr. Moore's defense by addressing the significant question or whether he counts as a career offender, and that the Court finds that the ends of

1 justice served by the time exclusion outweigh the interest of the public to a speedy trial. It
2 is so stipulated.

3 Therefore, the parties jointly request that the Court continue the Status Conference
4 from June 16, 2016, to August 25, 2016, at 9:30 a.m. It is so stipulated.

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6 DATED: June 13, 2016

/S/
JERRY Y. FONG, Attorney for
Defendant SYLVESTER MOORE

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9 DATED: June 13, 2016

/S/
CHRISTINA M. McCALL, AUSA
for Plaintiff UNITED STATES OF
AMERICA

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12
13 ~~PROPOSED~~ ORDER

14 Pursuant to the parties' stipulation and good cause appearing herein, it is hereby
15 ordered that the Status Conference as to Defendant Sylvester Moore shall be continued from
16 June 16, 2016, to August 25, 2016, at 9:30 a.m.

17 Furthermore, the Court orders that, pursuant to 18 USC §3161 (h)(7)(B)(iv), the time
18 period between June 16, 2016 and August 25, 2016 shall be excluded for purpose of
19 computing time for the application of the Speed Trial Act, and the Court finds that the
20 continuance and excluded time are necessary to maintain the continuity of counsel and to
21 provide reasonable time for defense counsel to adequately prepare the defense, and that the
22 ends of justice served by the time exclusion outweigh the interest of the public to a speedy
23 trial. It is so ordered.

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26 DATED: 6/13/16


HON. KANDIS WESTMORE,
MAGISTRATE JUDGE